DIESEL SIP WORKGROUP
SUMMARY OF STRATEGIES FOR
STATIONARY DIESEL SOURCES (updated 8/16/05)

Criteria for evaluating each measure:
- Environmental Benefits
- Technical Feasibility
- Economic Feasibility
- Implementation Feasibility
- Societal Benefits/Env Justice
- Enforceability

DESCRIPTION OF STRATEGY	PROS	CONS
Proposed changes to Nox RACT rules (Subchapter 19) would require that all permitted generators use ULSD in 2007. Could extend to <1mmBTU by amending definition in Subchapter 8.	Should be verifiable reduction in PM, Nox. Use of ULSD does not pose any performance or supply concerns (other states are pursuing this strategy as well) Other states have implemented	Only applies to generators over 1 million BTUs, approx. 1500 permits, which misses half or more of universe Slightly higher cost (.05-.10)
Require that use of ULSD be a criteria for getting a general permit for new emergency generators	Would provide an incentive to use ULSD (less reporting) General permits will require ULSD (with no rule change) for non-emergency generators	This might conflict with current criteria for general permits
Add fuel requirement for sulfur content to fuel subchapter 9.	Would apply to all generators, not based on size (including emergency) or use so could potentially pull in grandfathered sources.	May need separate fuel storage for separate uses (boiler, emergency generator, etc.). Are recordkeeping and random samples sufficient for Enforcement?
Develop contract requirement that ULSD be used in all state contracts including sources <1 mil BTU (e.g., building leases)	Might incentivize switch to ULSD	Not known how many contract or pieces of equipment would be affected (may accomplish same thing as already proposed Nox RACT changes)
Require or provide incentives to retrofit with control devices or replace (emergency gens should be exempt)	Could be used on regular generators with new or modified sources Verifiable reductions of Nox, PM (60%)	Not know how cost-effective Need to use ULSD Old engines can't use DPFs
DEP Proposed New Source Performance Standard, Nox RACT for down to 50 hp engines (June 2005)		
Scrappage/incentives for replacement of higher emitting engines with Selective Catalytic Reduction/urea control systems	Less regulatory burden, less operational requirements for emergency generators Applies to >5 ton/year	Cost Diesel would need 90% reduction May be cost-effective for PM/Nox

Limited amnesty for grandfathered generators to upgrade without triggering State of the Art requirements.	New models are far less polluting. Low cost to department. Financial incentive for owners because newer ones are more fuel efficient.	Can't be a federal requirement Unknown universe
Nox trading of stationary with mobile retrofits using new Nox RACT rules as the incentive/trigger	Gives facilities more operational flexibility	EPA doesn't like facility level cap like this might be
Put generators/compressors on timers (make this a permit condition?)	Very inexpensive, low tech	Hard to predict emission reductions
Converting diesel generators to natural gas fueled generators	Gas is cheaper, less polluting, less permit requirements	Bigger engine, possibly more Nox? No amassed supply of gas onsite for emergency use.